



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
Washington, D.C. 20224

August 29, 2007

SMALL BUSINESS/SELF-EMPLOYED DIVISION

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MEMORANDUM FOR DIRECTOR, CAMPUS COMPLIANCE OPERATIONS

FROM: William F. Conlon/s/*William F. Conlon*
Director, Specialty Programs

SUBJECT: Interim Guidance on Estate Tax Lien Releases

The purpose of this memorandum is to provide guidance for the timely release of Form 668-J, Notice of Federal Estate Tax Lien Under Internal Revenue Laws. The Form 668-J is recorded to secure estate tax deferred under IRC § 6166.

Upon receipt of full payment of the deferred tax under IRC § 6166, the Cincinnati Campus Estate & Gift Tax Operation will coordinate with Technical Service, Advisory to ensure that the Form 668-J is released in a timely manner. Campus will notify Technical Service, Advisory within 10 working days after receiving notification of payment.

The Cincinnati Campus will utilize the Command Code BMFOLR to determine which Technical Service, Advisory group would most likely have recorded the tax lien, and instruct them through secured e-mail to release any Form 668-J lien that may have been recorded. If no liens are found, the Technical Service, Advisory group will check the Integrated Collection System (ICS) to determine if a Form 668-J lien may have been recorded in another area. If it is determined that a Form 668-J lien was recorded in another area, the Technical Service, Advisory group will provide the tax lien information to the Technical Service, Advisory group responsible for releasing the lien.

The Cincinnati Campus will print a copy of the e-mail notification for the accounting file or will update the history sheet as appropriate to reflect that notification has been made.

- Technical Service, Advisory will continue to follow all other procedures outlined in IRM 5.5.8.5.1 IRC § 6324A Form 668-J (Technical Services Actions).
- The Cincinnati Campus Estate & Gift Tax Operation will continue to follow all other procedures outlined in IRM 4.25.2.1.16 Miscellaneous – Estate Tax.

Internal Revenue Manual 4.25.2.1.16 will be updated to reflect the above procedures by January 31, 2008.

If you have any questions, please contact Estate & Gift Tax Policy, Attorney-Advisor, Michele L. Moser.

cc: Director, Campus Reporting Compliance
Director, Campus Compliance Services
Director, Collection Policy
Director, Advisory, Insolvency & Quality
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